

EXHIBIT "1"

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
THE IT GROUP, INC., <i>et al</i> ,)	Case No. 02-10118 (MFW)
)	Jointly Administered
Debtors.)	
)	
IT LITIGATION TRUST,)	
)	
Plaintiff,)	Civ. A. No. 04-CV-1268 (KAJ)
)	
v.)	
)	
DANIEL A. D'ANIELLO, FRANCIS J. HARVEY,)	
JAMES C. MCGILL, RICHARD W. POGUE,)	
PHILLIP B. DOLAN, E. MARTIN GIBSON,)	
ROBERT F. PUGLIESE, CHARLES W.)	
SCHMIDT, JAMES DAVID WATKINS,)	
ANTHONY J. DeLUCA, HARRY J. SOOSE,)	
THE CARLYLE GROUP, THE CARLYLE)	
GROUP L.L.C., CARLYLE PARTNERS II, L.P.,)	
CARLYLE SBC PARTNERS II, L.P., CARLYLE)	
INTERNATIONAL PARTNERS II L.P.,)	
CARLYLE INTERNATIONAL PARTNERS III,)	
C/S INTERNATIONAL PARTNERS, CARLYLE)	
INVESTMENT GROUP, L.P., CARLYLE-IT)	
INTERNATIONAL PARTNERS, LP,)	
CARLYLE-IT INTERNATIONAL PARTNERS II,)	
L.P., CARLYLE-IT PARTNERS L.P.,)	
and T.C. GROUP, L.L.C.,)	
)	
Defendants.)	

DECLARATION OF THOMAS P. GLASS

I, Thomas P. Glass, declare as follows:

1. I am one of the attorneys representing Plaintiff The IT Litigation Trust in this matter.
2. Attached as Exhibit A to this declaration are copies of the relevant portions of the deposition Francis Harvey, conducted February 6, 2002, in *In The Matter of The IT Group, Inc. et al.* United States Bankruptcy Court, For the District of Delaware, Case No. 02-10118(MFW).

I declare under perjury that the foregoing is true and correct.

Executed on this 9th day of January, 2006, in Cincinnati, Ohio

A handwritten signature in black ink, appearing to read 'Tom P. Glass', is written above a horizontal line.

Thomas P. Glass

102212 001/849682_1.DOC

EXHIBIT "A"

The IT Group, Inc., et al.

Page 8

[1] chance to see this document and that the witness has
[2] clearly reviewed this material in preparation for the
[3] deposition we will reserve the right to question on this
[4] material once it is received.
[5] MR. SAUNDERS: You can reserve whatever
[6] right you have. Obviously, you know, to the extent that
[7] there are difficulties that arise for you by virtue of
[8] the timing of the situation generally or the fact that
[9] you asked for document production the same day you asked
[10] for depositions to start, we may have a different view.
[11] But I understand you are reserving whatever right you
[12] have.

BY MS. BENENATI:

[13] Q: Mr. Harvey, could you state and spell your full
[14] name for the record?
[15] A: Francis Harvey, F-r-a-n-c-i-s, H-a-r-v-e-y.
[16] Q: Please state your home address.
[17] A: It's 116 Twin Oaks Drive, Los Gatos, California,
[18] 95032.
[19] Q: What is your present position with IT Group?
[20] A: I'm the acting CEO.
[21] Q: How long have you held that position?
[22] A: Since November 12th.
[23] Q: What was your position prior to that time?

Page 9

[1] A: I was on the board of directors — relative to
[2] The IT Group?
[3] Q: Yes.
[4] A: I was on the board of directors.
[5] Q: Were you otherwise employed other than your
[6] position on the board?
[7] A: Yes. I'm on a number of boards.
[8] Q: Did you have any other connection with The IT
[9] Group prior to November 12 besides sitting on the board
[10] of directors?
[11] A: Prior to November 12?
[12] Q: I believe that's the date you —
[13] A: No. Just I was on the board of directors
[14] starting about June of '99.
[15] Q: So you never held any other management position
[16] in the company prior?
[17] A: No management position, no.
[18] MR. SAUNDERS: Make sure you let the
[19] questioner completely finish her question before you
[20] answer.
[21] Q: That's November 12 of 2001?
[22] A: Correct.
[23] Q: What is your affiliation with The Carlyle
[24] Group?

Page 10

[1] MR. SAUNDERS: Objection to form. You can
[2] answer.
[3] A: I don't have any formal affiliation with The
[4] Carlyle Group. I am on two other boards for Carlyle.
[5] Q: What is the relationship between Carlyle and
[6] The IT Group?
[7] A: Carlyle up until November controlled the board.
[8] They had approximately, they had a 20 plus percent
[9] ownership of the company.
[10] Q: That changed in November 2001?
[11] A: Right. My understanding is they no longer had
[12] control of the board after November 2001.
[13] Q: Did that coincide at all with your appointment
[14] as acting CEO?
[15] A: No. The election of the next board would be,
[16] would have been the May meeting, May 2002 board meeting.
[17] So until May 2002 they had a majority of the board of
[18] directors appointed.
[19] Q: I'd like to turn to documents that are attached
[20] to a document that was filed under seal in the bankruptcy
[21] court. I believe the date is not on here.
[22] MR. SCHLERF: The date it was filed under
[23] seal? I think it was January 23rd.
[24] MS. BENENATI: Thank you. I'd like to mark

Page 11

[1] it as Exhibit 2
[2] (Harvey Deposition Exhibit No. 2 marked for
[3] identification.)
[4] BY MS. BENENATI:
[5] Q: Would you please turn to the fifth page of the
[6] document, page entitled "IT Group Consolidated Income
[7] Statement"?
[8] A: Page 6? Is that right?
[9] Q: It's page 6 of the fax I believe, yes.
[10] Are you familiar with this document?
[11] A: Yes.
[12] Q: Who prepared this document?
[13] A: The CFO's — the financial organization of IT
[14] Group.
[15] Q: That would be under the direction of Mr. Soose?
[16] A: Yes.
[17] Q: Is anyone else involved in the preparation of
[18] the statement — let me finish my question, please.
[19] Was anyone else involved in the preparation
[20] of the statement besides Mr. Soose's group?
[21] A: Yes.
[22] Q: Who would that be?
[23] A: It would be various business line organizations
[24] that contribute, that are part of the IT Group.